

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL T. FLYNN,

Defendant.

Criminal Action No. 17-232-EGS

MOTION FOR ORDER CLARIFYING TRAVEL PARAMETERS

Michael T. Flynn (Mr. Flynn) by and through his counsel Sidney Powell, respectfully requests this court issue an order consistent with the Court's comments at the hearing on June 24, 2019, and clarify his ability to travel throughout the United States in compliance, coordination, and with the permission of his Pre-Trial Services Officer.

1. Mr. Flynn's lead counsel resides and has offices in North Carolina and Texas. Two of his siblings, with whom he is very close, reside in California. Events are scheduled in Tennessee and Georgia in the next couple of months, one is to fundraise for veterans and the other event is to fundraise for his Legal Defense Fund.

2. As the Court stated at our hearing on June 24, Mr. Flynn is not to be treated any differently than other defendants, and we do not request special treatment. Rather, we simply request that he be allowed to coordinate his travel with his Pre-Trial Services Officer with whom he communicates regularly—as the Court suggested at the hearing¹—and that he

¹ The Court said on June 24: “but there are no impediments to him traveling as long as he -- and I don't want to misspeak, but pretrial has procedures in place. You have to let them know a certain number of days or hours beforehand. There are -- they aren't going to -- they're not going to impede

be allowed to travel within the continental United States as needed after obtaining permission from his Pre-Trial Services Officer and complying with whatever requirements are routinely imposed.

3. It is beyond dispute that Mr. Flynn poses no risk of flight. He has effectively been on probation for close to two years; he has traveled to Korea and back, and he has surrendered his passport.

4. Mr. Flynn served his country with the greatest distinction for thirty-three years, including five years in actual combat on missions. Mr. Flynn wrote a blank check on his very life in service of this country—as have numerous other members of his family currently and in the past.

5. Mr. Flynn is a protector of others and defender of liberty. He has borne enormous responsibility throughout his life, and he will voluntarily report to prison if that is required.

6. The government voiced no opposition to this motion. Mr. Van Grack advised that government counsel defer to the Court and pretrial services on any restrictions.

7. For these reasons, Mr. Flynn requests that this Court enter an order consistent with its comments at the hearing on June 24, 2019, that Mr. Flynn’s travel would not be impeded and that Mr. Flynn be allowed to coordinate his travel throughout the continental United States as required by and with the permission of his Pre-Trial Services Officer as others do.

on his ability to travel, . . . I’m certainly not impeding his ability to travel, but he just needs to follow the procedures like everyone else.” Hr’g Tr. 7, June 24, 2019 (p.m).

Respectfully submitted,

s/ Jesse R. Binnall
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Admitted *Pro Hac Vice*

CERTIFICATE OF CONFERENCE

Undersigned counsel conferred by email today with Mr. Van Grack and Ms. Curtis who advised that the government defers to the Court and the Pretrial Services Officers on the terms of travel requirements.

/s/Sidney Powell
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PROPOSED ORDER

Upon consideration of Mr. Flynn's unopposed Motion To Clarify Travel Parameters filed August 14, 2019, and the government's response thereto noting full deference to the Court and Pre-Trial Services, it is hereby ORDERED that, consistent with the Court's comments at the hearing on June 24, 2019, Mr. Flynn is authorized to travel within the United States so long as he fully complies with the standard rules and requirements imposed by the Court's Pre-Trial Services Officer. Mr. Flynn may continue to follow these procedures unless and until further order of this Court.

SO ORDERED the ____ of August, 2019

The Honorable Emmet G. Sullivan, Jr.
United States District Judge